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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN CIVIL LIBERTIES UNION
FOUNDATION,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
JUSTICE,

Defendant.

CASE NO. 3:23-CV-05248-JD

**SAMPLES DECLARATION IN SUPPORT OF
JOINT STIPULATION**

I, J. Wesley Samples, declare as follows:

1. I am an Assistant United States Attorney and represent the Defendant in the above captioned matter. I am a member in good standing of the State Bar of California. I make this declaration in support of the Parties' Joint Stipulation (the "Joint Stipulation"). The matters stated in this declaration are true of my own knowledge, and if necessary, I could and would competently testify to them.

2. Pursuant to Civil Local Rules 6-1(b), 6-2(a) and 7-12, and subject to the Court's approval, the Parties agree and jointly stipulate to continue the initial case management deadlines as follows:

PROPOSED INITIAL CASE MANAGEMENT DEADLINES

Stipulated Date	Date Set In Dkt. No. 6	Event	Governing Rule
Thursday, February 22, 2024	Thursday, December 21, 2023	*Last day to: • meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan • file ADR Certification signed by Parties and Counsel (form available at http://www.cand.uscourts.gov)	FRCivP 26(f) & ADR L.R.3-5 Civil L.R. 16-8(b) & ADR L.R. 3-5(b)
Thursday, February 29, 2024	Thursday, January 4, 2024	**Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per Standing Order re Contents of Joint Case Management Statement (also available at http://www.cand.uscourts.gov)	FRCivP 26(a)(1) Civil L.R. 16-9
Thursday, March 7, 2024	Thursday, January 11, 2024	INITIAL CASE MANAGEMENT CONFERENCE (CMC) at 10:00 AM in: Courtroom 11, 19th Floor Phillip Burton Federal Building 450 Golden Gate Avenue San Francisco, CA 94102	Civil L.R. 16-10
* If the Initial Case Management Conference is continued, unless otherwise ordered this deadline is continued to 21 days in advance of the Initial Case Management Conference.			
** If the Initial Case Management Conference is continued, unless otherwise ordered this deadline is continued to 7 days in advance of the Initial Case Management Conference.			

3. These requests are made in view of the availability of counsel during the holidays, and so that Plaintiff and Defendant may have an opportunity to meet and confer regarding the underlying FOIA request to possibly narrow the issues in this case before any other filings are made.

4. This is the first request by the Parties to modify the schedule in this case. The requested modifications will not impact the schedule other than as to the Joint Case Management Statement, and date for the Initial Case Management Statement, and the deadlines that depend thereon.

I declare under penalty of perjury under the laws of the United States that the above is true and accurate. Executed this 18th of December, 2023, in San Francisco, CA.

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2 DATED: December 18,2023

Respectfully submitted,

3 /s/ J. Wesley Samples

4 J. Wesley Samples

Assistant United States Attorney

5 Attorney for Defendant